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DISTRICT COURT
CLARK COUNTY, NEVADA

LISTON M. GOODMAN, an Individual;
Plaintiff,

vs.

PANDA EXPRESS, INC. d/b/a PANDA
EXPRESS, a Foreign Corporation; PANDA
RESTAURANT GROUP, INC. d/b/a PANDA
EXPRESS, A Foreign Corporation; DOE PANDA
EXPRESS EMPLOYEES; DOES I through XX,
inclusive; and ROE BUSINESS ENTITIES I
through XX inclusive,
Defendants.

CASE NO. 2:22-cv-24

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES
(SECOND REQUEST)**

IT IS HEREBY STIPULATED by and between the parties hereto and their respective
counsel of record, as follows:

I. DISCOVERY COMPLETED

1. A Rule 36(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
2. Plaintiffs have disclosed their initial disclosures and three supplements thereto;
3. Defendant has disclosed its initial disclosures;



4. The parties have propounded and responded to written discovery requests;
5. Plaintiff's deposition was taken on April 11, 2022; and
6. Troy Russell, MD's deposition was taken on June 14, 2022.

II. DISCOVERY TO BE COMPLETED

1. Plaintiff will take the deposition(s) of Defendant's corporate designees pursuant to FRCP 30(b)(6) on July 11, 2022;
2. The parties will depose Steven Olenchak, PA on July 7, 2022;
3. The parties will depose Defendant's employees;
4. The parties will disclose expert witnesses and depose their respective experts;
5. The parties intend to serve, and respond to, additional written discovery;
6. The parties intend to conduct the depositions of other parties, fact witnesses, Plaintiff's treating providers, and the parties' experts; and
7. The parties intend to supplement numerous expert witnesses and reports.

III. REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS PROVIDED BY THE SCHEDULING ORDER

Counsel has been working diligently to adhere to the current discovery deadlines, however; additional time is needed to take depositions and designate experts. The parties are currently attempting to schedule mediation with Retired Judge Trevor L. Atkin. In order to facilitate a private mediation and avoid potentially unnecessary expert fees, the parties have agreed to continue the discovery deadlines sixty (60) days.

IV. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

	<u>EXISTING DEADLINES</u>	<u>PROPOSED DEADLINES</u>
Close of Discovery	August 22, 2022	October 21, 2022
Initial Expert Disclosures Deadlines	June 22, 2022	August 22, 2022
Rebuttal Expert Disclosure Deadline	July 21, 2022	September 19, 2022



Final Date for Dispositive Motions	September 19, 2022	November 18, 2022
Pretrial Order	October 20, 2022	December 19, 2022

IT IS SO STIPULATED.

CHRISTIANSEN TRIAL LAWYERS

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP**

/s/ Peter S. Christiansen
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ORDER

Based on the foregoing stipulation, and good cause appearing:

IT IS SO ORDERED.


United States Magistrate Judge

Dated: June 16, 2022

CHRISTIANSEN
— TRIAL LAWYERS —

